

DeMaria, Eva

From: DeMaria, Eva
Sent: Tuesday, October 27, 2015 3:32 PM
To: 'Johnson, Laura'; Scheffler, Linda; Pronold, Michael
Cc: Kim, Stacey; LIVERMAN Alex (liverman.alex@deq.state.or.us); Matt McClincy (mcclincy.matt@deq.state.or.us); Sheldrake, Sean
Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Thanks, Laura. I'll let our NPDES Compliance Unit know, but with the information provided about both sites, it's likely to be a low priority on their list. I'll let you know if this gains traction. Thanks!

From: Johnson, Laura [mailto:Laura.Johnson@portlandoregon.gov]
Sent: Thursday, October 22, 2015 8:07 AM
To: DeMaria, Eva <DeMaria.Eva@epa.gov>; Scheffler, Linda <Linda.Scheffler@portlandoregon.gov>; Pronold, Michael <Michael.Pronold@portlandoregon.gov>
Cc: Kim, Stacey <Kim.Stacey@epa.gov>; LIVERMAN Alex (liverman.alex@deq.state.or.us) <liverman.alex@deq.state.or.us>; Matt McClincy (mcclincy.matt@deq.state.or.us) <mcclincy.matt@deq.state.or.us>; Sheldrake, Sean <sheldrake.sean@epa.gov>
Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Dear Eva,

Here are my thoughts in response to your email earlier this month:

US Moorings:

I would be happy to participate in a joint inspection at the US Moorings site in the near future. I do have concerns about the ongoing stormwater quality at this facility.

Their Tier 2 plan to address copper and zinc at Outfall B included adding specialized metalzorb media in some catch basins and roof downspouts. They installed these measures long before the 6-30-16 deadline and they are now evaluating the effectiveness. The 1200Z permit includes a requirement to complete a Benchmark Exceedance Report if additional exceedances occur after the installation of the treatment measures. They had exceedances in the Spring of 2015, and prepared a Benchmark Exceedance Report in response. So they are working within the requirements of the permit.

To respond to your thoughts about erodible soils: There is an area of the site that is unpaved. There are also areas of the site with damaged pavement. In addition, during my 10/3/13 inspection drainage basin A had a significant amount of sediment that needed to be cleaned up.

US Naval Facility:

I have not been to this facility. It was inspected by the City Industrial Stormwater Program in 2003. Their SIC code is 9711-National Security and Training. The inspection notes did not discuss what activities are done on the dock. I do not know if either Sector R or Q apply to their operations.

They may have installed a grassy swale along the river in 2010, but I am not sure. Our file has a single erosion control map dated 1/20/2010, but there was not a permit for any work at that time thru the Bureau of Development Services, and I have no additional information.

A joint inspection at this facility would be beneficial as well. Stormwater from this facility discharges to the municipal storm sewer system.

Will you also be looking into the operations at the US Coast Guard facility at 6767 N Basin Ave? It is located right next door to the US Naval facility. Alex and I went out there a few years ago.

Please let me know if I can be of further assistance. Sorry for the delayed response.

Laura Johnson
City of Portland Industrial Stormwater Program
503-823-7192

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Friday, October 02, 2015 2:50 PM
To: Johnson, Laura <Laura.Johnson@portlandoregon.gov>
Cc: Kim, Stacey <Kim.Stacey@epa.gov>; LIVERMAN Alex (liverman.alex@deq.state.or.us) <liverman.alex@deq.state.or.us>; Matt McClincy (mcclincy.matt@deq.state.or.us) <mcclincy.matt@deq.state.or.us>; Sheldrake, Sean <sheldrake.sean@epa.gov>
Subject: FW: Info on US Moorings and Navy Reserve Swan Island

Laura-

Thanks for talking with me about the US Moorings and USN facilities. Here's the email chain we discussed. As I mentioned, Alex requested EPA look into SW issues at both facilities as based on her knowledge of the sites, there were some concerns. However, after talking a bit more in depth with her this afternoon, it sounds like the concern at US Moorings was more the SW infiltration and impacts to GW. EPA apparently issued a RCRA 3013 order to the Corps to do an investigation of ongoing sources and they complied with and completed the order. Are you aware of any erodible soils, open areas in which SW could impact surface waters (even through the GW pathway)? You stated that US Moorings has been mostly cooperative. Most recently, they've exceeded their benchmarks and are now in the midst of implementing Tier 2 corrective actions. If you think it might be worthwhile for EPA to conduct a SW inspection of the site, I can request an inspection. It can be a joint inspection (whether EPA is the lead or not can be discussed later) and an opportunity for EPA to see and learn how BES conducts inspections and vice versa.

In regards to the US Naval facility, as I understand it, the facility does not have SW coverage because it doesn't fall under one of the SIC classifications. Do you know what activities occur at the facility? I looked at maps and noticed that there is a dock. Could the site fall under Sector Q (Water Transportation) or R (Ship and Boat Building and Repairing Yards)? It's unclear to me whether this site should be inspected under CWA or other authorities. Any insight would be appreciated. Thanks.

Eva

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From: LIVERMAN Alex [<mailto:liverman.alex@deq.state.or.us>]
Sent: Thursday, July 30, 2015 2:53 PM
To: DeMaria, Eva
Cc: MCCLINCY Matt; Sheldrake, Sean
Subject: RE: Info on US Moorings and Navy Reserve Swan Island

Hi Eva.

The US Moorings site operates under the 1200Z permit. The City of Portland is DEQ's agent for the 1200Z registrants in Portland and inspects this facility. The latest inspection info, enforcement referrals and DEQ and USACE response documents are attached. I also included the email on contacts for the dock work coordination for the 404-like process that Sean mentioned. I believe the last contact, Jody Marshall, has left the USACE, though. Back to Chris Budai...

The Navy Reserve site was referred to EPA for source control work in 2011 after being non-responsive to DEQ's efforts. There is very little information available on that site.

The Coast Guard site (next door to the Navy) has been cooperative on source control efforts with DEQ. Dan Hafley is the current project manager and we did a joint site visit with the City of Portland inspector a few years back. Even though USCG doesn't have a permit, it is a site with industrial activities that the City inspects every so often and gives technical advice to under their authority of the MS4 permit and City Code. USCG is currently implementing additional source control measures and subsequent effectiveness monitoring and we expect to write a SCD in 2016.

Thanks again for the offer of 1200Z enforcement help, but we have that covered through the appropriate channels (City referrals and DEQ Office of Compliance and Enforcement) per our Performance Partnership Agreement with EPA Region Office of Water. I will certainly keep you posted on sites that can use a nudge from EPA to support DEQ's requests for source control work (stormwater, groundwater or soils/banks), though, whether they have an NPDES nexus or not.

Talk to you again soon...

--Alex

From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]
Sent: Thursday, July 30, 2015 2:26 PM
To: LIVERMAN Alex
Cc: MCCLINCY Matt; Sheldrake, Sean
Subject: Info on US Moorings and Navy Reserve Swan Island

Hi Alex-

During our meeting yesterday, you mentioned that DEQ/the City? had attempted to obtain SW information from US Moorings and the US Navy Reserve on Swan Island as part of your source control evaluations. Both have proven recalcitrant. If you could send me what inspection reports, storm water info you have on both sites, that would be most appreciated. Coast Guard too?

Also, as I've mentioned previously, and I know I'm sounding like a broken record, if you have facilities that are either taking either too long in complying with the 1200Z permit or the CWA, and you believe they need a little push (or inspection) from EPA, please pass those names on to me. The NPDES Compliance Unit here usually plans inspections a year ahead of schedule and the targeting for inspections in 2016 is happening now.

Thanks again.

Eva DeMaria
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